Field Offices – Providing Assistance for Animal Feeding Operations

Environmental specialists who work in the animal feeding operations program face a unique challenge.

The DNR has 23 full-time equivalent (FTE) positions assigned to animal feeding operations (see Tables 1 and 2). That is one specialist for every four counties or one per 2,316 square miles.

Those 23 FTEs are responsible for working with about 4,250 confinements that are required to have manure management plans.

The DNR has had a record number of construction permit applications for animal feeding operations in calendar year 2005, and has issued 185 permits as of Oct. 27. Field offices inspect the proposed site for each permit application.

Another 1,800 open feedlots have voluntarily registered with the DNR. Of these, about 150 are large enough to need an operating permit. There are about 3,000 manure applicators, both confinement and commercial, who need to be trained annually. These regulated facilities are a small fraction of the total number of livestock and poultry operations in the state.

Above: *Typical three-building hog confinement facility found in Iowa.*

Table 1: Field Office FTEs, SFY 2005

FO1 NE	FO2 NC	FO3 NW	FO4 SW	FO5 SC	FO6 SE	Des Moines	Total
2.32	5.00	5.64	2.76	3.57	1.72	2.00	23.00

"This is one of the few program areas where the legislature wrote the rules very specifically, so field office staff are required to meet certain performance standards such as conducting a site survey when a new facility is proposed, inspecting earthen basins and reviewing manure management plans annually," said Ken Hessenius, supervisor of the Spencer DNR field office. "Producers also need more technical assistance when rules are so specific."

Of all field office activities, this program area has the highest workload, with activities increasing dramatically after the DNR added 12 FTEs in 2002. (See Figure 1 on page 4.)

Inside

A Typical Month in the Life of an AFO Specialist

An interview with Jenn Christian, environmental specialist, Spencer

MMP Inspections

Each specialist in our field office inspects up to 12 manure management plans (MMPs) per month. I spend about four hours per plan, including drive time. I review the plan in the office for about one-half hour, checking for correctness and history, before I visit the operation. If it's a permitted site, I review the permit conditions.

The actual inspection can take up to four hours, with drive time averaging about one hour in each direction and spending up to two hours on site. I see this as a huge educational opportunity. When I meet with the producer, I check application records, review the MMP for correctness and walk around the site to ensure that it complies with manure storage and dead animal disposal rules. Sometimes it's a long inspection because the producer wants more information on the rule changes. I always carry fact sheets and phone numbers of people so that I can refer producers to someone who can answer their questions.

These visits can be very hard to schedule, especially during the fall and spring when I might make four appointments, but have two of the producers cancel (sometimes after I've actually driven to the facility). Or, if I find a violation such as manure overflowing from a storage structure, it may take me longer than I planned, because I need to document all the details while I am at the facility. So sometimes, I will need to reschedule with another producer.

Tier System

One thing we've done to better allocate our time is to identify the producers who have difficulty staying in compliance with the regulations so that we can spend more time with them. Producers who have had violations in the past fit into this category. We reward those producers who have complied with environmental regulations by not inspecting their facility as often.

Travel Time – Violations – Emergency Response

I never know when I go out if I will need to respond to a spill or a complaint, just because I may be the closest DNR specialist in the area. As I drive to or from an inspection, I often see a violation from the road, such as a pool of manure in a field, which indicates over-application. I might also see commercial applicators' equipment without the required signage or piles of dead hogs. I may have to stop to take care of these or other violations such as open burning or solid waste disposal problems.

If a spill has occurred, the person closest to the spill site responds so that we can prevent more damage and ensure that the material is cleaned up promptly and adequately. My first response at the site is to find the spill source and prevent it from spreading or reaching a water of the state. I look for tile line inlets and other channels that could spread the spilled substance. If there is a fish kill, I take field readings and collect water samples above, below and at the suspected pollutant source. Field and lab results also document the source when a referral is necessary.

Complaints

Our goal with complaints is to check them out and determine whether they are valid. The number one complaint that I hear is about improper manure

Over-application of manure is one of the most frequent complaints received in the field offices.

application such as over-application, not meeting separation distances to homes or protected water areas, spilling manure on roads, etc. If I find a problem, I work with people for compliance.

Earthen Basin Inspections

On average, I inspect about four per month. Since we started the basin inspections, I have seen a definite improvement. I think we are reaching a point where producers understand the regulations and are doing better maintenance on the facilities.

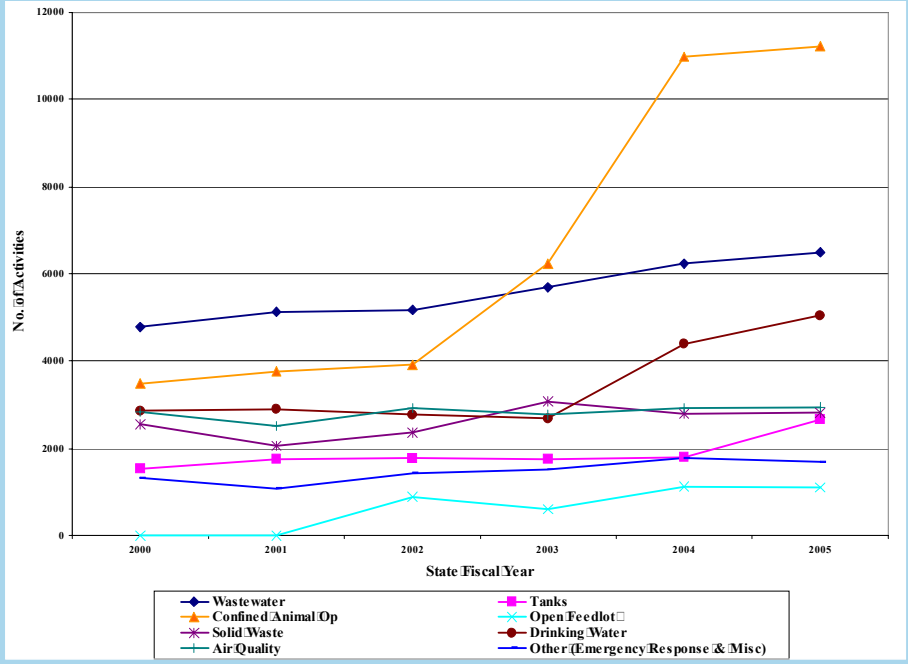
Construction Site Surveys

If a permit is required, we inspect the site, making an appointment with the producer and the county at a time that we can all meet. These are easier to schedule, since the producer is anxious to begin construction. I spend about two hours preparing for the site visit by reviewing the MMP, the master matrix requirements and the permit application. Usually, I spend a minimum of 30 to 45 minutes at the site – long

Table 2: Annual Field Office Activities — Animal Agriculture

Confined Animal Feeding Operations — AFO tracking split effective 7/1/01. See Open Lot section, below.	**SFY 2000**	**SFY 2001**	**SFY 2002**	**SFY 2003**	**SFY 2004**	**SFY 2005**	**Total**
CAFO Insps - Routine	911	861	874	973	2,126	1,883	**7,628**
CAFO Insps - Complaints	487	501	294	350	278	268	**2,178**
CAFO Visits	243	273	273	271	596	600	**2,256**
CAFO Assist	1,378	1,590	1,961	4,053	7,103	7,677	**23,762**
CAFO - Site Surveys	44	48	49	128	132	209	**610**
CAFO Complaints	416	492	356	272	272	301	**2,109**
*CAFO NOVs			105	191	470	276	**1,042**
Subtot CAFO	**3,479**	**3,765**	**3,912**	**6,238**	**10,977**	**11,214**	**39,585**
Open Feedlot Operations — effective 7/1/01							
Open Feedlot Insps - Routine			75	40	187	121	**423**
Open Feedlot Insps - Complaints			74	69	78	52	**273**
Open Feedlot Visits			102	92	177	86	**457**
Open Feedlot Assist			530	303	544	708	**2,085**
Open Feedlot - Site Surveys			14	13	17	44	**88**
Open Feedlot Complaints			63	60	74	56	**253**
*Open Feedlot NOVs			28	21	47	41	**137**
Subtot Open Feedlot			**886**	**598**	**1,124**	**1,108**	**3,716**

Figure 1. Environmental Services Division Field Office Activities, SFY 2000 - 2005



Left: *Legislation in 2002 added duties and reduced permitting and MMP thresholds. The legislation also authorized the DNR to charge fees and to add 12 FTEs to provide technical assistance to animal producers. Figure 1 illustrates the increase in animal feeding operation activities during and after 2002.*

enough to answer the county staff or producer's concerns, and to check for compliance. I schedule extra time to measure any questionable separation distances.

Concrete Inspections

Since the laws changed in 2002, we've started doing concrete inspections. We require producers who are constructing a facility to have their contractors call us when they are getting ready to pour concrete. If we can work it into our schedule, we check the concrete, the rebar placement, etc. as the concrete is being poured.

Other Efforts and Outreach

Sometimes I make a site visit at a producer's request – because of something they want me to look at or review. I spend the bulk of my time, about 60 hours per month, in outreach, providing technical assistance by answering many questions over the phone, giving small presentations, conducting interviews for the media and assisting in producer training.

An equal amount of time is spent in the field on the MMP and earthen basin inspections, and site surveys. I spend an average of two hours a month measuring odors near animal feeding operations.

I spend about eight hours a month on the manure applicators' certification program, helping applicators understand the regulations or planning training sessions for them.

It's important, too, to receive training and to learn new regulations. Field specialists have to know the rules well enough to implement them and to explain them to producers.

Referrals

Referrals to DNR's legal staff take a lot of time as I develop a report and a referral package. Referrals are typically made after we've made many efforts to bring the facility into compliance or when there is a serious environmental problem such as a fish kill.

Goals

Our goal in working with livestock and poultry producers is to maintain or improve the quality of our natural resources. If we can provide the technical assistance so that a producer learns how to do this, then we have accomplished that goal.

For more information, contact Barb Lynch, Field Office Bureau Chief, at 712-262-4177. *Prepared October 2005*